

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

DEBRA MAYS JACKSON

PLAINTIFF

v.

CAUSE NO. 3:23-cv-03095-KHJ-MTP

**TOM DUFF, IN HIS INDIVIDUAL AND
OFFICIAL CAPACITIES, STEVEN
CUNNINGHAM, IN HIS INDIVIDUAL AND
OFFICIAL CAPACITIES, BRUCE MARTIN, IN
HIS INDIVIDUAL AND OFFICIAL CAPACITIES,
JEANNE CARTER, IN HER INDIVIDUAL AND
OFFICIAL CAPACITIES, GEE OGLETREE, IN HIS
INDIVIDUAL AND OFFICIAL CAPACITIES,
HAL PARKER, IN HIS INDIVIDUAL AND
OFFICIAL CAPACITIES, J. WATT STARR, IN HIS
INDIVIDUAL AND OFFICIAL CAPACITIES,
ALFRED MCNAIR, IN HIS INDIVIDUAL AND
OFFICIAL CAPACITIES, GLENN
MCCOLLOUGH, IN HIS INDIVIDUAL AND
OFFICIAL CAPACITIES, SHANE HOOPER, IN
HIS INDIVIDUAL AND OFFICIAL CAPACITIES,
FORD DYE, IN HIS INDIVIDUAL AND
OFFICIAL CAPACITIES, ALFRED RANKINS JR.,
IN HIS INDIVIDUAL AND OFFICIAL
CAPACITIES, MISSISSIPPI INSTITUTION OF
HIGHER LEARNING, AND JOHN DOES 1-12**

DEFENDANTS

**STATE DEFENDANTS' JOINDER IN INDIVIDUAL DEFENDANTS' RESPONSE
IN OPPOSITION TO PLAINTIFF'S MOTION TO AMEND COMPLAINT**

Defendants Mississippi Board of Trustees of State Institutions of Higher Learning ("IHL"), incorrectly named as Mississippi Institution of Higher Learning, along with defendants Tom Duff, Steven Cunningham, Bruce Martin, Jeanne Carter Luckey, Chip Morgan, Gee Ogletree, Hal Parker, J. Walt Starr, Alfred McNair, Glenn McCullough, Shane Hooper, and Ford Dye, all in their official capacities as members or alleged members of the IHL Board (collectively referred to herein as the "Board Members"), and Alfred Rankins, Jr. in his official capacity as Commissioner (the "Commissioner"), (IHL, the Board Members,

and the Commissioner referenced collectively herein as the “State Defendants”) file this Joinder in Individual Defendants’ Response in Opposition to Plaintiffs’ Motion to Amend Complaint [dkt. #29] and expressly join in the request that Plaintiff Debra Mays Jackson be required to demonstrate why she should be granted leave to file a fourth iteration of her complaint that substantially differs from all previously filed versions.

The State Defendants do not oppose an amendment that simply adds Title VII claims against IHL as allowed by Mays Jackson’s February 28, 2024 Right to Sue Letter, provided that IHL would not be subject to the same claims in a separate action recently filed by Mays Jackson.¹ Mays Jackson, however, has proposed a twenty-page amended complaint containing 74 paragraphs that is almost entirely different from the current operative complaint. She does this without demonstrating how the additional changes would cure any deficiencies or why they should otherwise be allowed.

The State Defendants, therefore, join in the requests made in the Individual Defendants’ Response in Opposition to Plaintiffs’ Motion to Amend Complaint and incorporate by reference all the contents of that response herein.

¹On May 28, 2024, Mays Jackson filed a new action in this Court against IHL asserting the same Title VII claims she seeks to add here. *See Mays Jackson v. Board of Trustees of the Institutions of Higher Learning*, 3:24-CV-308-KHJ-MTP.

Dated: June 6, 2024

Respectfully Submitted,

MISSISSIPPI BOARD OF TRUSTEES
OF STATE INSTITUTIONS OF HIGHER
LEARNING, TOM DUFF, IN HIS OFFICIAL
CAPACITY, STEVEN CUNNINGHAM, IN HIS
OFFICIAL CAPACITY, BRUCE MARTIN, IN
HIS OFFICIAL CAPACITY, JEANNE CARTER,
IN HER OFFICIAL CAPACITY, GEE
OGLETREE, IN HIS OFFICIAL CAPACITY,
HAL PARKER, IN HIS OFFICIAL CAPACITY, J.
WATT STARR, IN HIS OFFICIAL CAPACITY,
ALFRED MCNAIR, IN HIS OFFICIAL
CAPACITY, GLENN MCCOLLOUGH, IN HIS
OFFICIAL CAPACITY, SHANE HOOPER, IN
HIS OFFICIAL CAPACITY, FORD DYE, IN HIS
OFFICIAL CAPACITY, and ALFRED RANKINS
JR., IN HIS OFFICIAL CAPACITY

By: /s/ Ashlyn B. Matthews
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CERTIFICATE OF SERVICE

I hereby certify that on this date I electronically filed the foregoing with the Clerk of the Court using the ECF system, which sent notification of such filing to the following:

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Dated: June 6, 2024

/s/ Ashlyn B. Matthews
Ashlyn B. Matthews